FILED

## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

DEC 07 20205 H

UNITED STATES OF AMERICA. ) Plaintiff. )	CLERK, U.S. DISTRICT COURT  Case #_19-CR-916
v.	Hon: Tharp Presiding Judge
OTHO LEE HARRIS. ) Defendant.	G - G

## MOTION FOR APPOINTMENT OF COUNSEL

Now Comes, Otho Lee Harris, pro se., and respeftfully moves this Court for Appointment of Counsel to this instant case.

Deft. asserts that Counsel Paul Paprocki, have been ineffective and Defts. make the following assertions;

- 1. On the date of December 6, 2019, under titled 18 U.S. Code se sec. 844 (i), Deft. was charged with an Arson.
- 2. On or about the last week of <u>August 2020</u>, Defendant received a call from Counsel Paul Paprocki,

Counsel Paul Paprocki, informed the Defendant of the following:

- a. he/Paprocki is a private attorney,
- b. he/paprocki have been paid by the government to represent me/ Defendant.
- c. Counsel Paul Paprocki, advised Defendant that he will investigate certain issues in his case.
- d. Defendant maintain that since his initial call from Paul Paprocki, he/Deft. have not heard form Counsel Paul Paprocki,
- e. Defendant have made numerious of attempts by way of mail, email, and phone to contact Counsel Paul Paprocki, but to no avail.

- Counsidering the state of our nation, Deft. is unaware of counsel health to properly defend him in this matter.
- 3. Defendant asserts under the 6th and 14th Amendment to the United States Constitution, he is entitled to the representation of effective assistance of counsel.

Wherefore, Defendant request this Honorable Court appoint counsel to represent him.

Respectfully Submitted:

Mr. Otho Lee Harris Reg. # 54769-424

Mètropolitan Corr'l Ctr.

71 W. Van Buren St. Chicago, IL 60605

Date: //-30-20

## ADDITIONAL FACTS IN SUPPORT OF MOTION FOR APPOINTMENT OF COUNSEL

- 1. On the date of 11-19-20, Eight (8) days after Defts.

  court date, Counsel Paul Paprocki, Contacted Defts. via

  phone and sound to be in good health.
- 2. Counsel <u>P. Paprocki</u>, was paid and assigned this instant case approximately three (3) months ago.
- 3. Counsel <u>P. Paprocki</u>, have not done any of the investigation warranted in this case, inwhich him and Defts. discussed back in August.
- 4. Counsel <u>P. Paprocki</u>, have forgot about the defense him and Defts. discuss.

  And suggested to Defts. wife that the evidence is clear against the Defts. he should plea bargain and get less time then a trial.
- Defendant asserts that such neglectful act of duty by

  Att'y P. Paprocki, is an obvious blatant act of ineffective assistant of counsel.

WHEREFORE: Defendant request this Court recoup the money P.

Paprocki have received and direct it towards Defendants defense.

RESPECTFULLY SUBMITTED

Date: 11-30-20

Mr. Otho Lee Harris

Reg. #54769-424

Metropolitan Corr'l. Ctr.

71 W. Van Buren st. Chicago, IL 60605

## MOTION TO COMPEL DISCOVERY AND/OR SUBPOENA:

- Video Surveillance and/or discs for the date of 9/10/19,
  from 5:00 am. til 3:00 pm.
  Located at 7901 S. Cottage Grove Ave. Happy Liquor & Food
  Store video depicting the fire, and the collecting of evidence
  by (SA/CFIC) Ellen Michelin.
- 2. Body Camera worn by (SA/CFIC) Ellen Michelin, and dask camera depicting the collecting of evidence.
- 3. Mr. Abbas Hamdan, boost Mobile Store owner at 809 E. 79th St. indicated that a customer threaten to burn his store down and he have the incidant on video.

  I'd like a copy of that tape.
- 4. On the date of 9/30/19, video surveillance of the DNA swab, and the taking of my clothing by the AFT at area #4 Police Station and the interrogation.
  - I'd need that video
- 5. Retest the DNA on the bleach jug, bleach cap and glove by an independant scientist.

To determine its origin saliva/sweat or blood that belong to Defendant.

M. Modelle Hours
Reg. #54749-429
Metropselden Buren St.
N. W. Van Buren St.
Millergo, Ill 60605

DEC 07 2020 16 THOMAS G. BRUTON CLERK, U.S. DISTRICT COURT









Legal Man